

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT, )  
                        )  
Plaintiff,           )  
                        )  
vs.                   )      Case No. 3:23-cv-00243  
                        )  
SOUTHERN BAPTIST CONVENTION; )      Judge Campbell  
GUIDEPOST SOLUTIONS LLC; and )      Magistrate Judge Frensley  
EXECUTIVE COMMITTEE OF THE )      Jury Demand  
SOUTHERN BAPTIST CONVENTION, )  
                        )  
Defendants.          )

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**RESPONSE IN OPPOSITION TO GUIDEPOST SOLUTIONS LLC'S  
MOTION FOR A PROTECTIVE ORDER**

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Pursuant to Rule 7.01 of the Local Rules of Court, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Response in Opposition to the Motion for a Protective Order filed by Defendant Guidepost Solutions LLC (Doc. No. 133).

As the previously discussed date of February 26, 2024, for Plaintiff's deposition of Guidepost Solutions LLC ("Guidepost") pursuant to Fed. R. Civ. P. 30(b)(6) has passed, Plaintiff respectfully submits that the instant motion is moot and should therefore be denied. Moreover, the Court should deny Guidepost's request for costs and fees pursuant to Rule 26(c)(3) and Rule 37(a)(5) because the circumstances of this case would make an award of expenses unjust. Guidepost has repeatedly refused to comply with its discovery obligations in this litigation and has stalled the progression of this litigation for months. In further support of why the circumstances of this case would make an award of costs and fees unjust, Plaintiff hereby incorporates by reference his arguments regarding the Rule 30(b)(6) deposition of Guidepost as

set out in his Memorandum in Support of Plaintiff's Third Motion to Compel Defendants' Compliance With Deposition Notices. (Doc. No. 131, pp. 1-3).

For the foregoing reasons, Guidepost's Motion for a Protective Order should be denied as moot, and Guidepost's request for costs and fees pursuant to Rule 26(c)(3) and Rule 37(a)(5) should be denied.

Dated: March 7, 2024

Respectfully submitted,

s/ Andrew Goldstein  

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**Todd G. Cole, Esq., BPR # 031078**  
**Andrew Goldstein, Esq., BPR # 037042**  
COLE LAW GROUP, P.C.  
1648 Westgate Circle, Suite 301  
Brentwood, TN 37027  
Telephone: (615) 490-6020  
Fax: (615) 942-5914  
tcole@colelawgrouppc.com  
agoldstein@colelawgrouppc.com

-and-

**Robert D. MacGill, Esq. (*pro hac vice*)**  
**Scott E. Murray, Esq. (*pro hac vice*)**  
**Patrick J. Sanders, Esq. (*pro hac vice*)**  
MACGILL PC  
156 E. Market St.  
Suite 1200  
Indianapolis, IN 46204  
Telephone: (317) 721-1253  
robert.macgill@macgilllaw.com  
scott.murray@macgilllaw.com  
patrick.sanders@macgilllaw.com

*Attorneys for Plaintiff*

## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Response in Opposition to Guidepost Solutions LLC's Motion for a Protective Order to be electronically filed with the Clerk of the Court on March 7, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

Todd G. Cole, Esq.  
Andrew Goldstein, Esq.  
COLE LAW GROUP, P.C.  
1648 Westgate Circle, Suite 301  
Brentwood, TN 37027  
Telephone: (615) 326-9059  
[tcole@colelawgrouppc.com](mailto:tcole@colelawgrouppc.com)  
[agoldstein@colelawgrouppc.com](mailto:agoldstein@colelawgrouppc.com)

Robert D. MacGill, Esq.  
Scott E. Murray, Esq.  
Patrick J. Sanders, Esq.  
MACGILL PC  
156 E. Market St.  
Suite 1200  
Indianapolis, IN 46204  
Telephone: (317) 721-1253  
[robert.macgill@macgilllaw.com](mailto:robert.macgill@macgilllaw.com)  
[scott.murray@macgilllaw.com](mailto:scott.murray@macgilllaw.com)  
[patrick.sanders@macgilllaw.com](mailto:patrick.sanders@macgilllaw.com)

### *Counsel for Plaintiff*

John R. Jacobson, BPR #14365  
Katharine R. Klein, BPR #19336  
Riley & Jacobson, PLC  
1906 West End Avenue  
Nashville, TN 37203  
(615) 320-3700  
(615) 320-3737 *Facsimile*  
[jjacobson@rjfirm.com](mailto:jjacobson@rjfirm.com)  
[kklein@rjfirm.com](mailto:kklein@rjfirm.com)

Scarlett Singleton Nokes, Esq.  
R. Brandon Bundren, Esq.  
E. Todd Presnell  
BRADLEY ARANT BOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
Telephone: (615) 244-2582  
[snokes@bradley.com](mailto:snokes@bradley.com)  
[bbundren@bradley.com](mailto:bbundren@bradley.com)  
[tpresnell@bradley.com](mailto:tpresnell@bradley.com)

Gene R. Besen, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
Fountain Place  
1445 Ross Avenue, Suite 3600  
Dallas, Texas 75202  
Telephone: (214) 257-9758  
[gbesen@bradley.com](mailto:gbesen@bradley.com)

Thomas J. Hurney, Jr., Esq.  
Gretchen M. Callas, Esq.  
JACKSON KELLY PLLC  
500 Lee Street East, Suite 1600  
Post Office Box 553  
Charleston, West Virginia 25322  
Telephone: 304-340-1000  
[thurney@jacksonkelly.com](mailto:thurney@jacksonkelly.com)  
[gcallas@jacksonkelly.com](mailto:gcallas@jacksonkelly.com)

*Counsel for the Executive Committee of the Southern Baptist Convention*

Steven G. Mintz (admitted pro hac vice)  
Terence W. McCormick (admitted pro hac vice)  
Scott Klein (admitted pro hac vice)  
Mintz & Gold LLP  
600 Third Avenue  
25<sup>th</sup> Floor  
New York, NY 10016  
Telephone: (212) 696-4848  
[mintz@mintzandgold.com](mailto:mintz@mintzandgold.com)  
[mccormick@mintzandgold.com](mailto:mccormick@mintzandgold.com)  
[klein@mintzandgold.com](mailto:klein@mintzandgold.com)

*Counsel for Defendant  
Guidepost Solutions LLC*

L. Gino Marchetti, Jr., Esq.  
Matt C. Pietsch, Esq.  
TAYLOR, PIGUE, MARCHETTI & BLAIR,  
PLLC  
2908 Poston Avenue  
Nashville, TN 37203  
Telephone: (615) 320-3225  
[gmarchetti@tpmblaw.com](mailto:gmarchetti@tpmblaw.com)  
[matt@tpmblaw.com](mailto:matt@tpmblaw.com)

*Counsel for the Southern Baptist Convention*

s/ Andrew Goldstein  
ANDREW GOLDSTEIN